

STATE OF SOUTH CAROLINA

COUNTY OF PICKENS

2013CV3910500387

CIVIL CASE NUMBER

IN THE MAGISTRATE'S COURT

SUMMONS

Lena P Wilson
P. O. Box 851
Clemson, SC 29633
(864) 643-5790

PLAINTIFF(S)

Vs

Justin Burdine
305 Oakevale Dr.
Easley, SC 29640

DEFENDANT(S)

TO THE DEFENDANT(S) NAMED ABOVE:

YOU ARE SUMMONED and required to Answer the allegations and present any appropriate Counterclaims/Crossclaims to the attached Complaint/Counterclaim within THIRTY days from the first day after receipt of this Summons. Your Answer must be received by the:

Pickens County
Easley Summary Court
135 Folger Avenue
Easley, SC 29640
Phone: (864) 850-7076 Fax: (864) 850-7075

If you fail to Answer within the prescribed time, a Judgment by Default will be rendered against you for the amount or other remedy requested in the attached Complaint, plus interest and costs. If you desire a jury trial, you must request one within five (5) days before the date of trial. If no jury trial is timely requested, the matter will be heard and decided by the Judge.

Given under my hand:


JUDGE

READ ATTACHED INSTRUCTIONS CAREFULLY

March 1, 2013

STATE OF SOUTH CAROLINA)	IN THE MAGISTRATE'S COURT
)	13 th JUDICIAL CIRCUIT
COUNTY OF PICKENS)	
)	
LENA P. WILSON,)	
<i>Plaintiff,</i>)	
)	
vs.)	No. _____
)	
Greenville County Sheriff's Deputy)	
JUSTIN BURDINE (Badge #C-13))	
305 Oakvale Dr.)	
Easley, SC 29640,)	
<i>Defendant.</i>)	

VERIFIED COMPLAINT WITH JURY DEMAND

COMES NOW Plaintiff Lena P. Wilson complains of Greenville County Sheriff's Deputy Justin Burdine (Badge #C-13) as follows:

1. Upon information and belief, Defendant Greenville County Sheriff's Deputy Justin Burdine (Badge #C-13) resides at 305 Oakvale Dr., Easley, SC 29640.
2. Plaintiff Wilson and Plaintiff's husband called 911 dispatch on December 31, 2012 during a domestic argument.
3. Defendant Burdine and another officer responded to the call for assistance at Plaintiff Wilson's home.
4. After approximately thirty-five minutes inside the home, and solely with the intent to humiliate and degrade Plaintiff Wilson, Defendant Burdine decided to conduct a physical search of Plaintiff Wilson.
5. Although the pretext for the search was to search for weapons, Defendant Burdine knew that Plaintiff Wilson had no weapons on her because she was wear-

ing her night clothes, including a thin and partially transparent nightgown with no bra. She obviously had no place to hide any weapons.

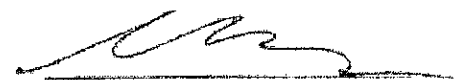
6. Defendant Burdine's search of Plaintiff Wilson was unreasonably long, intrusive, and sexualized.

7. Defendant Burdine violated Plaintiff Wilson's right to be free from unreasonable searches and seizures secured by the 4th and 14th Amendments to the U.S. Constitution.

8. Pursuant to 42 U.S.C. § 1983, Plaintiff Wilson requests compensatory and punitive damages up to the jurisdictional limit, plus her attorney's fees and costs.

9. Plaintiff Wilson demands a trial by jury.

Respectfully submitted,



Howard W. Anderson III
SC Bar No. 100329

Law Office of Howard W. Anderson III, LLC
PO Box 851
Clemson, SC 29633-0851
864-643-5790 (P)
864-332-9798 (F)
howard@hwalawfirm.com

Affidavit

State of South Carolina)
)
County of Pickens)

I, Lena P. Wilson, state that I have read the foregoing and affirm under penalties for perjury that the statements contained in Paragraphs 2-6 are true.

Lena P. Wilson
Lena P. Wilson

2/20/2013
Date

Subscribed to and affirmed before me this 20th day of February, 2013.

[Signature]
Notary Public

My commission expires: 9/19/22

